

NEGOVAN LAW

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VIA ECF ONLY

September 6, 2024

Honorable Paul S. Diamond
Eastern District Of Pennsylvania
US District Court
601 Market Street,
Philadelphia, PA 19106

Re: Griesing Law, LLC v. Kleinbard, LLC
CASE #: 2:22-cv-03302-PD

Dear Judge Diamond:

I write in response to the two orders filed on the above matter this week.

As set forth on my letterhead, I have separated from Griesing Law (on good terms) as of August 1, 2024 and have moved my practice full-time to Florida. This week, I have been on vacation in Seattle to visit family and return to Miami on Sunday, September 8, 2024. I have a long-scheduled doctor's appointment on September 9, 2024, and physically cannot fly to Philadelphia to be present for an evidentiary hearing on Thursday, September 12, 2024.

I have conferred with counsel for Kleinbard, Patrick McCabe. Mr. McCabe indicated that he would submit the discovery requests as directed by Your Honor's Order of yesterday. He also indicated that Kleinbard takes no position on my request for an adjournment of the hearing for two weeks. Therefore, I would respectfully request that Your Honor reschedule the hearing for the last week in September and I will make myself available to appear in person in Philadelphia. I understand that Griesing Law expects to file a motion for stay, pending disposition of the appeal currently before the Court of Appeals for the

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Third Circuit, which could render moot the issues to be addressed at the evidentiary hearing. Griesing Law expects to file the separate motion seeking a stay, but due to the immediacy of the September 12 hearing and my inability to appear on that date, I respectfully request a continuance to allow me to appear in person should Your Honor deny the stay application.

Thank you for your consideration of this request.

Respectfully submitted,

s/ Julie Negovan

Julie Negovan

cc: Patrick McCabe, Esq.
Nipun Patel, Esq.
Francine Griesing, Esq.